

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

|                                      |   |                                 |
|--------------------------------------|---|---------------------------------|
| STEPHANIE MRAZ,                      | ) | CIVIL ACTION                    |
|                                      | ) |                                 |
| Plaintiff,                           | ) | Civil Action No. 05-129         |
| v.                                   | ) |                                 |
|                                      | ) | Judge Sean J. McLaughlin        |
| MR. TILE, INC. and SANFORD           | ) |                                 |
| COOPERMAN, Individually as owner and | ) | <b>A JURY TRIAL IS DEMANDED</b> |
| operator of MR. TILE, INC.           | ) |                                 |
|                                      | ) |                                 |
| Defendants                           | ) |                                 |

**JOINT MOTION TO ENLARGE CASE MANAGEMENT ORDER**

Plaintiff Stephanie Mraz and Defendants Mr. Tile, Inc. and Sanford Cooperman, by their respective counsel, respectfully move this Court to enlarge the deadlines set forth in the current Case Management Order by three (3) months. In support of their Motion, the Parties state as follows:

1. In this case, Plaintiff alleges employment discrimination in violation of the Americans with Disabilities Act and wrongful termination.
2. The existing Case Management Order, entered on November 3, 2005, does not set forth a trial date or pretrial date, but provides a deadline for discovery of March 3, 2006, Plaintiffs' Pretrial Statement to be filed March 23, 2006, Defendants' Pretrial Statement to be filed April 13, 2006 (as well as dispositive motions).
3. Since the time the Case Management Order was entered, certain written discovery has been exchanged, and more is expected to be exchanged. Plaintiffs' discovery deposition was previously noticed, but postponed by agreement of counsel in order to first receive written discovery

responses.

4. Earlier this year, Plaintiffs' counsel chose to depart amicably from her firm and to go into business on her own, which has caused some disruption in case handling and a delay in moving forward with some cases, such as the instant action. Plaintiffs' counsel on this case will remain the same.

5. Also, Defendants' counsel was involved in a lengthy trial in January of 2006, causing some delay in scheduling discovery depositions in this case.

6. Counsel have been cooperative in accommodating each other with respect to the above professional issues.

7. The Parties have informally agreed to conduct discovery depositions after the existing discovery deadline and are in agreement that an extension of all of the deadlines in the Case Management Order by 3 months would be extremely beneficial to the further development of this case and preparation for trial.

**WHEREFORE**, the Parties respectfully request that this Court enlarge the deadlines in the existing Case Management Order by three (3) months. A proposed Amended Case Management Order setting forth specific dates is attached for the Court's consideration.

Respectfully submitted:

By: s/Bethann R. Lloyd  
Bethann R. Lloyd  
Counsel for Defendants

By: s/Edith Lynne Sutton, Esquire  
Edith Lynne Sutton, Esquire  
Counsel for the Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within JOINT MOTION TO ENLARGE CASE MANAGEMENT ORDER was served upon the following parties of record on this 23<sup>rd</sup> day of March, 2006 via U.S. Mail, first class, postage pre-paid:

Edith Lynne Sutton, Esquire  
11 Sunset Court  
Cranberry Township, PA 16066

s/Bethann R. Lloyd  
Bethann R. Lloyd, Esquire